

LEC receive US/COLR funding in excess of the amount of its identified US subsidy. It is the LECs' burden to demonstrate the appropriateness of any amount requested and the reasonableness of the proposed method to recover that amount.

1. Pooling Mechanism

Most of the parties did not argue for an interim pooling arrangement. SCC argued that an interim mechanism should be funded through contributions to a pool by all telecommunications companies. It also proposed that disbursements be made to all LECs that meet the support requirements and that a single statewide administrator administer the pool. TW/DMP recommended that we administer the pool. We do not believe that a pooling arrangement is necessary at this time. We have set out certain criteria for LECs to request explicit funding if their ability to support US is eroded by competitive entry. Since we do not believe that an immediate funding mechanism is necessary, we will consider a pooling mechanism, if requested, upon an appropriate LEC petition.

2. Offset by Reductions of Rates

The parties differed over whether rates should be reduced to offset any revenues received from an explicit subsidy mechanism. Some of the parties argued that a LEC should reduce its rates for other services, such as switched access charges, used to support US by the amount it receives from an interim mechanism. For example, SBT witness Martin argued that, if we adopt SBT's Alternative 1, it would be appropriate to reduce other rates by the amount of US support received since the total amount of implicit support would be made explicit. Since the amounts received under its Alternatives 2 and 3 will help to offset losses to implicit support from services that migrate to the ALECs, no reduction in prices for these services would be needed.

Other parties argued that rate offsets are not necessary. GTEFL witness Williams argued that rate reductions should not be required during the transition period. He contended that the interim mechanism recommended by GTEFL would not result in increased revenues. He said GTEFL's interim mechanism is designed to offset losses to current US support levels incurred as customers transfer to an ALEC's service. Accordingly, the LEC's former customers, which had been providing implicit US/COLR support, would be gone, along with all revenues formerly received by the LEC.

SCC argued that rates for local exchange service are well below the fully distributed cost of providing service, while the prices for toll, access and other non-basic services are priced to

be compensatory. This process created the implicit subsidies and, according to SCC, a need for rate rebalancing. The SCC panel argued that as the implicit subsidies are removed in any rate rebalancing process, local service rates should increase until they reach the maximum end-user benchmark rates. Throughout the process of rebalancing, all revenue reductions resulting from the removal of implicit subsidies must be recovered by each LEC on a revenue neutral basis.

We find that no offsets of monies or reductions of rates for other services are necessary until a LEC files a petition. If that proceeding results in recovery of more than the net contribution lost due to competitive entry, it may be necessary to reduce rates for existing services. We will make decisions on which rates to reduce, if any, and whether rate rebalancing is allowed or appropriate, on a case-by-case basis.

3. Monitoring Procedures

As previously noted, we are required by Section 364.386, Florida Statutes, to report each year on the status of competition in the telecommunications industry and address the impact of local exchange telecommunications competition on the continued availability of US.

The parties generally propose that we track trends in the industry, such as ALEC entry and US penetration, or obtain and analyze specific information, such as LEC revenue and cost data pertaining to the provision of US. The LECs predicated their monitoring procedures on acceptance of one of their proposals for an interim mechanism. GTEFL witness Williams stated that during the interim period, the Commission will potentially need to review and approve each LEC's periodic update filing of its US/COLR rates. He said we should also monitor the application of interconnection rates on an exception basis, similar to the process utilized in monitoring LEC access charge rates today. SBT witness Martin argued that normal tariff review procedures would suffice and no additional monitoring would be necessary.

Since we do not implement a funded interim mechanism here, there is no need for monitoring procedures specific to such a mechanism. If a LEC subsequently petitions and we authorize US/COLR funding, it may be appropriate to establish procedures to monitor such aspects as the collection and disbursement of US/COLR monies. However, any such procedures will be determined on a case-by-case basis.

Although monitoring of a US/COLR mechanism will not be necessary in the immediate future, we will be collecting data and monitoring trends in the telecommunications industry in order to comply with statutory mandates. In particular, we will conduct research and elicit information from industry representatives in order to prepare our recommendation on a permanent US/COLR mechanism as required by Section 364.025(4), Florida Statutes. Similarly, the annual report on competition in the Florida telecommunications industry required by Section 364.386(1), Florida Statutes, will entail significant research to monitor the impact of the recent statutory changes, among other factors.

VI. FURTHER PROCEEDINGS

Section 364.025(4), Florida Statutes, requires the Legislature to address implementation of a permanent mechanism within the next four years. There was a consensus among the parties that we should keep this docket open, or open a new docket, to address the long-term US issues that we must report on to the Legislature, including the development of any required permanent mechanism. The parties also agreed that the docket should remain open to implement monitoring mechanisms. TW recommended we hold a Phase II hearing to address long-term issues surrounding universal service.

We agree that at the conclusion of this proceeding work must commence immediately to perform the research and analysis required for our recommendation on a permanent mechanism. We also believe that issues concerning the structure of any permanent US/COLR mechanism should be resolved expeditiously, in order to remove uncertainties surrounding this matter and thus enable all providers to formulate their long-term business strategies.

Section 364.025(4), Florida Statutes, does not require that we hold formal hearings and we find no need to hold additional hearings. Our recommendation is not an action that will determine any of the parties' substantial interests. We will, therefore, keep this docket open until September 30, 1996. This will allow OPC and other parties to conduct additional discovery.

Our staff will conduct several workshops to research and analyze possible permanent mechanisms that will afford all interested persons a forum to present their views. After an evaluation of the available options, our staff will present a recommendation to us at an Internal Affairs meeting which, upon approval, will serve as our recommendation to the Legislature.

B. TW/DMP's Proposed Findings of Fact

1. In a competitive environment, there is a distinct economic advantage for companies that possess a ubiquitous network associated with the carrier of last resort and universal service obligations.

Accepted.

2. No investments have been identified by the LECs as being made exclusively to fulfill the carrier of last resort/universal service obligation.

Accepted.

3. The GTE and Southern Bell proposals for an interim mechanism are based on rate base rate of return factors.

Accepted, to the extent that TW/DMP means that the GTEFL and Southern Bell proposals are based upon embedded revenue requirement computations.

4. The GTE and Southern Bell proposals for an interim mechanism do not reflect investments made exclusively to fulfill carrier of last resort and universal service obligations.

Accepted.

5. The GTE and Southern Bell proposals create a "price squeeze" that limits competitive entry into the local market.

Rejected. This is speculation, not fact.

6. No specific facilities, costs, or investments are made solely to fulfill the COLR obligation.

Rejected. The record does not identify any investments made solely to fulfill the COLR obligation, but that does not necessarily show that no such investments have or will be made.

7. GTE and Southern Bell would have competitors fund LEC investments in plant deployed primarily to provide competitive services.

Rejected. The proposals are based upon carrier common line costs. No such plant was identified as being primarily to provide competitive service.

12. BellSouth's and GTEFL's proposals would ensure that end user rates would not decrease with the advent of competition. Requiring ALECs to pay a surcharge to the LECs for each customer they serve will create needlessly higher costs for the ALECs, resulting in higher price floors for the LECs. As long as the ALECs' costs are high enough to prevent them from profitably offering a competitively priced service, the incumbent LECs would have no incentive to lower their own end user prices even with the presence of competitors in the market, eliminating perhaps the greatest public interest benefit of the introduction of competition into the Florida local exchange market.

Rejected. This is speculation, not fact.

13. If BellSouth's or GTEFL's universal service mechanism were implemented, and assuming that an ALEC operated as efficiently as these LECs and that these LECs' residential service rates were close to their costs in providing service, the only way that an ALEC could match BellSouth's end user rates would be to price its residential service substantially below its costs.

Rejected. This is speculation, not fact.

14. The BellSouth and GTEFL universal service proposals will create an unreasonable barrier to competition.

Rejected. This is speculation, not fact.

15. The BellSouth and GTEFL universal service proposals would create a price squeeze that would preclude competitive entry into the Florida local exchange market.

Rejected. This is speculation, not fact.

16. Without knowing the full extent of interconnection, unbundling, and other co-carrier costs, many of which have yet to be established in parallel proceedings, it is impossible to determine the full extent of the LEC price squeeze. Until these other charges are established, the full effect of the proposed LEC interim universal service charges cannot be estimated.

Rejected as being based upon assumptions and speculation.

6. No state that has authorized local exchange competition has determined a need to establish an interim universal service fund prior to examining the need and appropriateness of a permanent universal service fund.

Rejected. The record does not demonstrate that other states have considered interim funds.

7. Permitting additional LEC recovery of costs from competition to account for customers the LEC loses to a competitor will not only insulate LECs from competition but will delay the introduction of true local exchange competition in Florida.

Rejected. This is speculation, not fact.

8. The LEC proposals to seek a return on facilities used to provide basic services, vertical services, and competitive service as if only basic services are provided over those facilities is insupportable.

Rejected. This is a conclusion, not a fact.

9. The "uncertainty" for which BellSouth expects to be compensated through a universal service fund is the same uncertainty shared by every LEC and ALEC competitor in the local exchange market.

Rejected. There is no evidence in the record that any ALEC has made any past COLR investments for which recovery is no longer a certainty due to a change to a competitive environment.

10. To adopt the BellSouth/GTEFL proposals would bring the process of transitioning to a competitive environment to a halt. If LECs are made whole for all competitive losses resulting from the entry of ALECs into the local exchange market, they will lose any incentive to increase their efficiency and improve their responsiveness in order to retain customers.

Rejected. This is speculation, not fact.

11. A targeted universal service subsidy, unlike a subsidy broadly directed at all competitive losses, would ensure that LECs receive compensation only in those circumstances in which costs related to those specific customers exceed revenues from those customers.

Rejected as unsupported by the record.

VII. FINDINGS OF FACT/CONCLUSIONS OF LAW

Along with their post-hearing filings, MFS and TW/DMP submitted a number of proposed findings of fact. Their proposed findings of fact and our rulings thereon are set forth below.

A. MFS' Proposed Findings of Fact

1. There has been no showing that for any particular geographic area or class of customers, LEC incremental costs for those customers in Florida exceed LEC revenues for those customers.

Accepted.

2. The evidence presented is that the average residential customer in Florida generates revenues for BellSouth significantly in excess of cost.

Rejected. The record demonstrates that Southern Bell's average cost for a residential line is "somewhat less than \$19 a month" and that the average revenue produced from a residential line is \$23.32. Whether \$23.32 is "significantly" in excess of \$19 is a judgment call.

3. The evidence shows that the average residential customer for GTEFL in high cost areas purchases the same level of vertical services as residential customers in low cost areas and those revenues are in excess of costs.

Rejected. The record demonstrates that, on an aggregate basis, revenues exceed costs. The record does not demonstrate that revenues generated from high cost areas exceed costs.

4. There has been no showing that any LEC utilizes its ubiquitous local exchange network exclusively or principally for the purpose of fulfilling its carrier of last resort or universal service obligations.

Accepted.

5. Based on experience in other states, the initiation of local exchange competition and the entry of ALECs into Florida local exchange markets is likely to have a negligible impact on the market share of LECs for at least several years.

Rejected. This is speculation, not fact.

8. GTE would have its competitors contribute to common overheads such as GTE's private airplanes.

Accepted, to the extent that TW/DMP intended to state that GTE's proposal would have its competitors contribute to common overheads such as GTE's private airplanes.

9. The amount of investments in facilities necessary to fulfill carrier of last resort responsibilities cannot be determined based upon the record in this proceeding.

Accepted.

C. MFS' Proposed Conclusions of Law

MFS also submitted eleven proposed conclusions of law. This Commission is not required to rule on proposed conclusions of law. Accordingly, we decline to do so.

D. Public Service Commission's Conclusions of Law

1. This Commission has jurisdiction over this matter pursuant to Chapter 364, Florida Statutes, and specifically, Section 364.025, Florida Statutes;
2. SBT and GTEFL, as the entities seeking US/COLR funding, had the burden to demonstrate that their proposed interim US/COLR mechanisms comported with Section 364.025, Florida Statutes;
3. SBT and GTEFL did not meet their burdens to demonstrate that their proposed interim US/COLR mechanisms comported with Section 364.025, Florida Statutes; and
4. The interim mechanism that we have found to be appropriate is fair to all parties, LEC and nonLEC, and is consistent with the requirements set forth in Section 364.025, Florida Statutes.

It is, therefore,

ORDERED by the Florida Public Service Commission that, during the interim period described in Section 364.025, Florida Statutes, local exchange companies shall continue to fund universal service and carrier of last resort obligations as they currently do. It is further

ORDERED that, if a local exchange company can demonstrate that its ability to sustain universal service as a carrier of last

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resort has been eroded, and that such erosion is specifically due to competitive pressures, it may file a petition for universal service relief, as set forth in the body of this Order. It is further

ORDERED that each of the findings made in the body of this Order is hereby approved in every respect.

By ORDER of the Florida Public Service Commission, this 27th day of December, 1995.

BLANCA S. BAYÓ, Director
Division of Records and Reporting

by: Kay Dwyer
Chief, Bureau of Records

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NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.59(4), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Any party adversely affected by the Commission's final action in this matter may request: 1) reconsideration of the decision by filing a motion for reconsideration with the Director, Division of Records and Reporting, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, within fifteen (15) days of the issuance of this order in the form prescribed by Rule 25-22.060, Florida Administrative Code; or 2) judicial review by the Florida Supreme Court in the case of an electric, gas or telephone utility or the First District Court of Appeal in the case of a water and/or wastewater utility by filing a notice of appeal with the Director, Division of Records and Reporting and filing a copy of the notice of appeal and the filing fee with the appropriate court. This filing must be completed within thirty (30) days after the issuance of this order, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900 (a), Florida Rules of Appellate Procedure.

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ATTACHMENT C

**FCTA TECHNOLOGY PLAN
SUBMITTED TO FDLN
FEBRUARY, 1996**

**ADVANCED CABLE
TELECOMMUNICATIONS
TECHNOLOGY FOR DISTANCE
LEARNING PAPER**

PRESENTED BY

**FLORIDA CABLE
TELECOMMUNICATIONS
ASSOCIATION**

FEBRUARY, 1996

Introduction

The vision of distance learning is that learning can occur unbound by the shackles of space and time through the use of advanced telecommunications technology. For university and community college leaders, that can mean providing access for many more students without having to build new campuses. For K-12 school administrators and teachers, that vision can mean having faster and greater access to the Internet and other information sources to support lesson plans and classroom instruction. For many citizens, distance learning could mean being able to access diverse information sources in libraries or in the home through interactive telecommunications networks. For a patient or doctor in a rural hospital, distance learning could mean having a renowned specialist in a remote location providing instant reaction to an MRI transmitted in real time in high definition television.

In each of these examples, the concept of distance learning brings to mind different desired outcomes, but there is a common thread. The FDLN has the awesome and exciting task of understanding these different goals and matching them up with current and emerging telecommunications technologies.

With respect to the reporting requirements in the 1995 Florida telecommunications law, the FDLN is at the beginning of a learning process. The FDLN has produced a preliminary needs assessment report while working diligently on a preliminary technology plan to assure that Floridians will benefit from the emerging distribution systems for interactive telecommunications.

The Florida Cable Telecommunications Association offers this information about the present and future capabilities of the interactive broadband networks we are building. We are tremendously excited about contributing to distance learning applications for schools, community colleges, universities, libraries, hospitals and government agencies. The broadband capabilities of local telecommunications cable networks can provide distribution

for many distance learning applications today.

The best distance learning strategy for now is pluralistic, transitional and localized. For some facilities, the best temporary technology may be cable, satellite, telephony, or wireless, or some combination. Three, five, or ten years from now the best solution for these same facilities may be one full-service digital pipeline selected after a rigorous competitive bidding process. If the FDLN is to provide a "template" against which distance learning projects are to be judged, let that template be dynamic rather than static.

Toward a Vision for Distance Learning

The FCTA collaborated with 27 experts to prepare this issue paper (see Appendix A). Interestingly, each interviewee had a unique perspective on distance learning - i.e., what delivery systems should be used, what information delivered, and what is done with the information at the remote site. Some wished to define distance learning in terms of bandwidth, applications, or a particular delivery system.

While a definition of distance learning can be quantified by a particular person or provider, the FCTA submits that such quantification on a statewide basis is premature. The FDLN needs instead to focus on a vision of distance learning driven by the goals of providing access for Floridians to a seamless, robust "network of networks."

Such a network is emerging and will evolve over the next decade. The passage of Florida's telecommunications reform act in 1995 and Congress' recent enactment of a federal telecommunications reform bill will greatly accelerate investments by various providers in their discreet networks. What is needed is the vision to assure access and interconnectivity. Developing this vision should be the primary goal of the FDLN.

The basic components of a robust statewide distance learning network already exist in Florida today. In addition, the components of community-wide and campus level networks for

distance learning are in place in Florida today. For purposes of this white paper, such networks will be termed Wide Area Networks, Community Area Networks, and Local Service Areas.

A statewide distance learning network (i.e. Wide Area Network) could evolve as a fiber optic and satellite interconnection between cable telecommunications companies, phone companies, and state private networks utilizing long distance or alternate access fiber backbones dedicated to carrying educational services between providers and users that are not in the same local area.

Many cable telecommunications companies have already interconnected with interexchange carriers and various uplinks for video transport and to selected local exchange companies for voice/data satellite transport. The cable telecommunications industry in Florida is planning or currently acquiring interconnection between cable telecommunications companies and to long distance and alternate access companies. Such interconnection is being accelerated by the passage of the Federal Telecommunications Reform Act of 1996.

The goal of cable telecommunications companies in Florida is to provide access across the entire state for all applicable communications attributes. Some of the attributes specific to an FDLN network are:

- | | |
|----------|-----------------|
| ■ SONET | ■ DS-1 (T-1) |
| ■ TCP/IP | ■ Digital Video |
| ■ DS-3 | ■ NTSC Video |

A Community Area Network for distance learning has many of the characteristics of the Wide Area Network described above. It would connect homes, businesses, schools, medical facilities, and government institutions through fiber optic, coaxial cable, twisted pair cable, wireless and electronic systems provided by cable telecommunications companies, local exchange companies, and local government/utilities private backbone structures. The Community Area Network has multiple attributes and interconnects local service areas. It delivers and directs

all traffic entering and leaving the distance learning "community" and distributes video and telecommunications services to and between users. Attributes at the Community Area Network level include all of those used by the Wide Area Network and additionally may include:

- | | |
|----------------------|---------------|
| ■ FDDI | ■ ATM |
| ■ Hybrid Fiber Cable | ■ Frame Relay |
| ■ Proprietary | ■ ISDN |
| ■ ETHERNET (802.3) | |

The local cable telecommunications company is the only provider with a broadband delivery system which can meet the speed requirements of all distance learning applications. Cable telecommunications companies in Florida have backbone and broadband distribution cable plant available to 98% of all residences, institutions, and commercial facilities in Florida. To prepare for local exchange competition, the cable telecommunications industry in Florida is rapidly upgrading local systems to include digital phone switches, data hubs/routers, multiplexers, and carrier agreements to be full-service communications providers.

The Local Service Area for distance learning is comprised of the diverse equipment, systems, and networks used to deliver, originate, or store information or provide communication services to the schools, businesses, medical centers, civic centers, government institutions, or campuses that are geographically small and generally encompass a few acres or less. Its services are diverse and the systems to support them are several.

Within the Local Service Area are Local Area Networks which provide many functions and attributes including:

- interconnecting computers and terminals;
- interactive functions using voice, video, and multimedia;

- electronic library materials to support video teleconferencing;
- remote classrooms, individual tutoring, virtual reality, and immersion experiences; and
- the traditional functions of telephone, fax, and data.

Within the campus are several structures and infrastructures dedicated to this effort. Special classrooms, fixed and moveable media equipment, and robust and diverse premises cabling will be required to support many distance learning services. The Local Service Area is where the vast majority of distance learning services are used or generated. The attributes are many and varied and often are proprietary to equipment vendors.

A majority of eligible facilities are currently connected and receiving basic and/or enhanced cable or communications services today. In many areas cable plant and electronics are already upgraded to fiber optic backbones and two-way video capabilities. There are trained engineers and technicians available to support all community users of cable services. The local cable telecommunications systems are fully capable of providing and maintaining video, data, voice transmission, and switching.

The Florida Cable Industry's Current Response to Distance Learning Needs

Florida's cable telecommunications companies are currently providing distance learning delivery in many locations in Florida. Cable's broadband infrastructure is connected to a vast majority of the facilities named in the 1995 law. A partial listing of current activities include:

- the free provision of cable television service to the large majority of public education institutions;
- "Cable in the Classroom" - i.e. video programming to support classroom instruction;
- programs such as "Beyond the Classroom" and "Partnerships in Excellence" wherein classes are invited to use dedicated production facilities and studios for learning about television production and for actually producing programs to be cablecast;
- the connection of elementary schools with a 10MB per second cable modem delivering access to the Internet;
- a pilot program connecting an entire community to the Internet via cable using high speed cable modems for access;
- the provision of cable channels to school districts, community colleges, and universities to cablecast programming directly to the schools and, in some cases, the homes of cable subscribers;
- through the Lightspan Partnership, delivering educational material (homework, review sessions, etc.) from schools into students' homes via the cable system;
- cablecasting local school board meetings;
- conducting "Critical Viewing" workshops for parents in one community's Head Start Program;
- providing a GED television series in one community to prepare students to pass

the required exams to obtain a high school degree;

- providing, in partnership with one local school board, SAT tutoring classes for high school seniors preparing to take the test;
- providing access to live, interactive teleconferences and electronic field trips offered by a variety of programming services such as Mind Extension University, Turner Adventure Learning, and Achievement T.V.;
- conducting teacher training workshops to demonstrate effective strategies for using video in the classroom;
- offering daily access through cable modems to "Ingenius" and "What on Earth" programs for computers in the classroom.

Based on a survey of FCTA's members, the chart on the following page depicts current cable industry capabilities for provision of different distance learning needs.

CABLE TELECOMMUNICATIONS INDUSTRY CAPABILITIES													
DISTANCE LEARNING NEEDS	(POTS) Plain Old Telephone Service	Cable Modem [sub-channel]	Cable Modem [multi-DS1]	Cable Modem [EtherNet]	Broadcast Video Channel	Dedicated 2-way Video Ch.	Multi-channel broadband RF	Video/Data Storage & Retrieval	Hybrid Fiber Coax w/digital switching	Internet Access	Lan Server/Bridges	CAN's/WAN's	Production Facilities
(POTS) Plain Old Telephone Service	X		X						X				
Voice conference	X	X	X						X				
Low speed data [<28kbps]	X	X	X						X				
Data Conference [<56kbps]		X	X	X					X				
LAN bridging [>56kbps]			X	X					X				
High Speed data & Image [144kbps or >]			X	X					X				
Internet access [10mbps or >]		X	X	X					X				
Data Video [clips][10mbps or >]			X	X					X				
Talking Head Video Conf [<128kbps]		X	X						X				
Person-Person Video Conf [> 256kbps]			X	X					X				
Classroom Interactive Video Conf [>512kbps]			X	X					X				
Medical Video[135mbps]							X		X				
Broadcast Video [NTSC or 135mbps]					X	X	X		X				
Video/Data on Demand [store/retrieve/bill]						X	X	X	X				
Export a Teacher			X	X	X	X			X		X		
Export a Group			X	X	X	X	X		X			X	
Export Media		X	X	X	X	X	X	X	X	X	X		X
Application Development								X		X	X	X	X
Staff Training			X	X	X	X		X	X	X	X		X

The Road Ahead for Cable and Distance Learning in Florida

At the most recent national trade show of the cable telecommunications industry, there was an intense focus on distance learning as evidenced by numerous exhibits by cable telecommunications companies, software and hardware suppliers, and cable programming networks.

A sampling of demonstrations from the Western Cable Show is intended to acquaint the FDLN staff and Board with the latest efforts to expand the cable telecommunications industry's provision of distance learning applications such as:

- delivery of multimedia computer-based curriculum into the home through cable's infrastructure;
- expansion of learning outside traditional classrooms through cable's infrastructure;
- design of individualized student learning paths through cable's infrastructure;
- provision of high speed Internet access over cable modems (See Appendix B).

The cable telecommunications companies of Florida are uniquely positioned to provide the broadband connectivity required by the eligible facilities in the emerging FDLN. We are connected to the vast majority of these institutions now and recognize the opportunities for significant business expansion through responding to their various distance learning needs and requirements. To these ends, Florida's cable telecommunications companies accept the challenge:

- 1) to establish the network attributes which will support any distance learning initiatives identified by the FDLN; and
- 2) to cooperatively design and construct seamless telecommunications network infrastructure for distance learning in Florida.

A Technology Plan Not Driven by Technology: Recommendations

The FCTA respectfully offers the following recommendations for consideration in the drafting of a preliminary technology plan:

- 1) The most pressing priority of the FDLN is to conduct an in-depth, sophisticated analysis of the distance learning needs of K-12 schools, community colleges, universities, libraries, and medical facilities identified in the 1995 Florida Telecommunications Act. Such an analysis would not only identify current capabilities and needs but seek to identify needs five and ten years out from the present based on an evolving vision of how emerging technology can serve and support critical distance learning applications. Such a vision would emphasize access for all Floridians and the evolution of a seamless "network of networks" for distance learning.
- 2) The current FDLN technology plan to be submitted to the Legislature by March 1, 1996, should avoid being prematurely restrictive and normative, and instead emphasize the need for cooperation and interconnection between distance learning distribution networks to achieve needed provision of services.

APPENDIX A INTERVIEWEES FOR WHITE PAPER (IN ALPHABETICAL ORDER):		
NAME	TITLE	ORGANIZATION
Mark Bailey	Director, Sales & Marketing	Time Warner Communications
Tracey Bailey	1993 National Teacher of the Year, State Coordinator for Educational Reform	Department of Education
Judith Boettcher	Director of Distance Learning	Florida State University
Joe Brewster	Director of Government Relations	Cox Cable
Janice Caluda	VP/Operations	Florida Cable Telecommunications Association
Leslie Carter	VP/GM, Tampa Bay Division	Time Warner Communications
Melinda Crowley	Coordinator, Educational Media	Education Technology, Department of Education
Dana Davis	Manager, Educational Development	Time Warner Cable, Full Service Network
Mike Eason	Chief, Bureau of Educational Technology	Department of Education
Susan Fell	Associate Director, Interactive Learning	Florida State University
Ken Fuchs	District Manager	Continental Cablevision
John Gamin	Director of Advertising	Adelphia Cable
Rich Gerstemeier	VP/GM, Orlando Division	Time Warner Communications
Bill Goetz	Regional Senior VP	Comcast Cable
Linda Harris	Board of Regents Coordinator for Distance Learning	Board of Regents, FSU
Steve Mason	Administrator	North West Community Hospital
Linda Nelson	Director, Education Technology	Tallahassee Community College
Diane Pickett	VP/Gov Relations & Public Affairs	Time Warner Cable
Bill Lindner	Secretary	Department of Management Services

APPENDIX A INTERVIEWEES FOR WHITE PAPER (IN ALPHABETICAL ORDER):		
NAME	TITLE	ORGANIZATION
Ernie Litz	Information Resources Management Consultant	Information Resource Commission
Denise Potvin	Specialist, Occupational Education and Economic Development	Division of Community Colleges
Peggy Rudd	Chief, Bureau of Library Development	Division of Library and Information Services
Phil St. Laurent	Marketing Production Specialist	Continental Cablevision
Lorraine Summers	Assistant Division Director	Division of Library and Information Services
T.K. Wetherell	President	Tallahassee Community College
Steve Wilkerson	President	Florida Cable Telecommunications Association
Pat Wright	VP/TCI Educational Technologies	TCI Technology Ventures, Inc.

APPENDIX B:

EXAMPLES OF CABLE TELECOMMUNICATIONS DISTANCE LEARNING APPLICATIONS